

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Joel Schneider,
Magistrate Judge

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO
DEFENDANT THE HARVARD DRUG GROUP, L.L.C., D/B/A
MAJOR PHARMACEUTICALS**

WHEREAS the Court entered Case Management Order No. 15, which provides a mechanism for certain defendants to obtain a without prejudice dismissal from all cases pending in this MDL alleging claims in connection with allegedly contaminated valsartan-containing drugs (“VCDs”);

WHEREAS Defendant The Harvard Drug Group, L.L.C., d/b/a Major Pharmaceuticals (“Major”) having provided the information and documents required by Case Management Order No. 15, and having agreed to the tolling provisions therein;

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Executive Committee and Major that all current cases pending and all future cases to

be filed in this MDL alleging claims against Major in connection with allegedly contaminated VCDs be and hereby are dismissed without prejudice.

/s/Marlene Goldenberg

Marlene Goldenberg
Goldenberg Law, PLLC
800 LaSalle Avenue
Suite 2150
Minneapolis, MN 55402
On behalf of Plaintiffs' Executive
Committee

Dated: June 25, 2020



Andrew Kaplan
Crowell & Moring LLP
On behalf of Defendant
The Harvard Drug Group, L.L.C.,
d/b/a Major Pharmaceuticals

Dated: June 25, 2020

CERTIFICATE OF SERVICE

I hereby certify that on June xx, 2020, I electronically filed the foregoing document using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

/s/ _____